



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

March 16, 2009

Mark E. Charpie
Innovations and Regulatory Affairs Manager
DeVilbiss Automotive Refinishing
11360 S Airfield Road
Swanton, Ohio 43558

Subject: Written Approval for use of ITW Tekna High Efficiency Spray Gun for Regulation 8, Rule 45, Motor Vehicle and Mobile Equipment Coating Operations

Dear Mr. Charpie:

The Bay Area Air Quality Management District (District) has completed our review of your December 11, 2008 petition requesting approval to use the DeVilbiss CVI High Efficiency Spray Gun with #510 air cap, ITW Tekna Spray Gun with 7E7 air cap, and DeVilbiss GTI Pro Spray Gun with T2 air cap within the District's jurisdiction. The results of the transfer efficiency testing in the report indicates that the ITW Tekna High Efficiency spray gun is capable of achieving equivalent or better transfer efficiency as high-volume, low-pressure spray gun equipment. As a result, this letter shall serve to grant written approval under Regulation 8, Rule 45, Section 303.3 to sell and operate the ITW Tekna High Efficiency spray gun for operations subject to Regulation 8, Rule 45. This approval is subject to the following conditions:

1. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the District jurisdiction that the gun is only approved for the application coatings subject to Regulation 8, Rule 45, Motor Vehicle and Mobile Equipment Coating Operations.
2. This approval is only valid if the air pressure supplied to the ITW Tekna High Efficiency is equal to or less than 22 psig. Any exceedance of this operating pressure will constitute a violation of Regulation 8, Rule 45, Section 303.3. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun shall not exceed 22 psig.
3. DeVilbiss Automotive Refinishing shall supply a 100 psig (full scale) mechanical pressure gauge with markings every 2 psig or a 160 psig (full scale) digital pressure gauge that measures in 1 psig increments with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the District. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the District that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation. Any deviation from this requirement will constitute a violation of Regulation 8, Rule 45, Section 303.3.
4. This approval is only valid if during actual operation the ITW Tekna High Efficiency spray gun is equipped with a properly operating pressure gauge that meets the criteria specified in condition number 3.
5. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation 7E7 and that the inlet air pressure shall not exceed 22 psig to all ITW Tekna High Efficiency spray guns sold or distributed for use within the District.

Spare the Air

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6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a ITW Tekna spray gun on all ITW Tekna High Efficiency spray guns sold or distributed for use within the District.
7. This approval is only valid if during actual operations the ITW Tekna High Efficiency spray guns are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the ITW Tekna High Efficiency spray gun model tested and shall not release any user from compliance with any other District rule or regulation, nor absolve any prior or subsequent violations. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the District.

If you have any questions regarding this approval, please contact Janet Simon, Air Quality Specialist at (415) 749-4780 or jsimon@baaqmd.gov.
Sincerely,



Kelly Wee
Director of Compliance and Enforcement

KJW:JS

Cc: Jeremy Kimball
Sr. Air Quality Inspector